

REMARKS

In the final Office Action, dated August 27, 2007, the Examiner rejects claims 1-4, 6, 8-9, 13-14, 17, 23-26, 28, 30-31, 35-36, 39, 46-49, 52-55, 58, and 60 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2004/0249801 (hereafter “KAPUR”) in view of U.S. Publication No. 2005/0234709 (hereafter “KLAVANS”); rejects claims 7 and 29 under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of “How to get a site listed in Google Glossary?”, internet citation, 1/30/2003, 2 pages retrieved from http://groups.google.com/group/google.public.labs.glossary/browse_thread/thread/53719c13c14dfb7f/c78873b1745039cc?q=glossary&num=3#c78873b1745039cc (hereafter “MAURER”); rejects claims 10-12, 32-34, 50, and 56 under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of U.S. Publication No. 2004/0073541 (hereafter “LINDBLAD”); rejects claims 18-19 and 40-41 under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of U.S. Patent No. 6,922,809 (hereafter “CODEN”); and rejects claims 20-22, 42-44, 51, and 57 under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of U.S. Patent No. 6,701,309 (hereafter “BEEFERMAN”). Applicant respectfully traverses these rejections.¹

Claims 1-4, 6, 8-9, 13-14, 17, 23-26, 28, 30-31, 35-36, 39, 46-49, 52-55, 58, and 60 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over KAPUR

¹ As Applicant's remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicant's silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Applicant that such assertions are accurate or such requirements have been met, and Applicant reserve the right to analyze and dispute such assertions/requirements in the future.

in view of KLAVANS. Applicant respectfully traverses this rejection.

Independent claim 1 is directed to a system for providing definitions. The system includes a server configured to receive a phrase to be processed, and select a plurality of documents each containing at least one definition for the phrase; and a user interface configured to present one or more definitions for the phrase in an order determined based on ranking of the documents that contain the presented one or more definitions. KAPUR and KLAVANS, whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, KAPUR and KLAVANS do not disclose or suggest a user interface configured to present one or more definitions for a phrase in an order determined based on ranking of documents that contain the presented one or more definitions. The Examiner relies on paragraph [0025], as well as paragraph [0176] and Fig. 8 of KAPUR for allegedly disclosing this feature (final Office Action, p. 4).

Paragraph [0025] of KAPUR discloses:

[0025] Referring to FIG. 2, according to one embodiment, server system 160 is configured to provide search result data and media content to client system 120, and server system 150 is configured to provide data and media content such as web pages to client system 120, for example, in response to links selected in search result pages provided by server system 160. As will be described in more detail below, server system 160 in one embodiment references various collection technologies for populating one or more indexes with, for example pages, links to pages, etc. Such collection technologies include automatic web crawlers, spiders, etc., as well as manual or semi-automatic classification algorithms and interfaces for classifying and ranking web pages within a hierarchical structure. In certain aspects, server 160 is also configured with search related algorithms for processing and ranking web pages, such as for example, the PageRank algorithm from Google. Server 160 is also preferably configured to record user query activity in the form of query log files.

This section of KAPUR discloses a server configured with search algorithms for classifying and ranking web pages. This section of KAPUR does not disclose documents containing definitions. This section of KAPUR also does not disclose a user interface.

Therefore, this section of KAPUR cannot disclose or suggest a user interface configured to present one or more definitions for a phrase in an order determined based on ranking of documents that contain the presented one or more definitions, as recited in claim 1.

Paragraph [0176] and Fig. 8 of KAPUR do not find support in U.S. Provisional Application No. 60/460,222, to which KAPUR claims priority. Applicant notes that the filing date of KAPUR is April 5, 2004, which is after Applicant's filing date of June 27, 2003. Thus, paragraph [0176] and Fig. 8 of KAPUR are not prior art with respect to the present application and cannot be relied on in a rejection of Applicant's claim 1.

Furthermore, none of the documents supplied by KAPUR as part of the provisional application disclose or suggest a user interface configured to present one or more definitions for a phrase in an order determined based on ranking of documents that contain the presented one or more definitions, as recited in claim 1. In fact, none of the documents supplied by KAPUR as part of the provisional application disclose or suggest definitions of phrases.

KLAVANS does not overcome the deficiencies of KAPUR with respect to the above feature of claim 1.

For at least the foregoing reasons, Applicant submits that claim 1 is patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination.

Claims 2-4, 6, 8-9, 13-14, and 17 depend from claim 1. Therefore, these claims are patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Independent claim 23 recites features which are similar to, yet possibly of different scope than, the features of claim 1. Therefore, this claim is patentable over

KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 24-26, 28, 30-31, 35-36, and 39 depend from claim 23. Therefore, these claims are patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 23.

Independent claim 46 recites features which are similar to, yet possibly of different scope than, the features of claim 1. Therefore, this claim is patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Independent claim 47 is directed to a system for determining definitions from distributed information stores. The system includes a search engine identifying a plurality of documents based on a search query including terms indicative of a presence of definitions, and storing information regarding each identified document; and a search front end matching a phrase for which a definition is sought against the stored information for each identified document, returning one or more matching definitions based on the matching of the phrase, and presenting each matching definition in an order determined based on a ranking of the documents that contain the presented one or more definitions. KAPUR and KLAVANS, whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, KAPUR and KLAVANS do not disclose or suggest a search front end matching a phrase for which a definition is sought against stored information for each identified document, returning one or more matching definitions based on the matching

of the phrase, and presenting each matching definition in an order determined based on a ranking of the documents that contain the presented one or more definitions.

The Examiner relies on Fig. 8, paragraph [0176], and paragraphs [0025-0026] of KAPUR for allegedly disclosing this feature (final Office Action, p. 9).

Paragraph [0025] of KAPUR was reproduced above. Paragraph [0026] of KAPUR discloses:

[0026] Server system 160 is configured to provide data responsive to various search requests received from a client system, in particular search module 126. Server systems 150 and 160 may be part of a single organization, e.g., a distributed server system such as that provided to users by Yahoo! Inc., or they may be part of disparate organizations. Server system 150 and server system 160 each includes at least one server and an associated database system, and may include multiple servers and associated database systems, and although shown as a single block, may be geographically distributed. For example, all servers of server system 160 may be located in close proximity to one another (e.g., in a server farm located in a single building or campus), or they may be distributed at locations remote from one another (e.g., one or more servers located in city A and one or more servers located in city B). As used herein, the term "server system" will typically include one or more logically and/or physically connected servers distributed locally or across one or more geographic locations. Additionally, the term "server" will typically include a computer system and an associated storage system and database application as is well known in the art.

Together, these two paragraphs of KAPUR disclose a server configured with search algorithms for classifying and ranking web pages, as well as a server system, which includes multiple servers and an associated database system. This section of KAPUR does not disclose or suggest returning definitions. Therefore, this section of KAPUR cannot disclose or suggest a search front end matching a phrase for which a definition is sought against stored information for each identified document, returning one or more matching definitions based on the matching of the phrase, and presenting each matching definition in an order determined based on a ranking of the documents that contain the presented one or more definitions, as recited in claim 47.

Paragraph [0176] and Fig. 8 of KAPUR do not find support in U.S. Provisional Application No. 60/460,222, to which KAPUR claims priority. Applicant notes that the

filing date of KAPUR is April 5, 2004, which is after Applicant's filing date of June 27, 2003. Thus, paragraph [0176] and Fig. 8 of KAPUR are not prior art with respect to the present application and cannot be relied on in a rejection of Applicant's claim 47.

Furthermore, none of the documents supplied by KAPUR as part of the provisional application disclose or suggest a search front end matching a phrase for which a definition is sought against stored information for each identified document, returning one or more matching definitions based on the matching of the phrase, and presenting each matching definition in an order determined based on a ranking of the documents that contain the presented one or more definitions, as recited in claim 47. In fact, none of the documents supplied by KAPUR as part of the provisional application disclose or suggest definitions of phrases.

KLAVANS does not overcome the deficiencies of KAPUR with respect to the above feature of claim 47.

For at least the foregoing reasons, Applicant submits that claim 47 is patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination.

Claims 48-49 and 52 depend from claim 47. Therefore, these claims are patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 47.

Independent claims 53 and 60 recite features which are similar to, yet possibly of different scope than, those recited in claim 47. Therefore, Applicant submits that these claims are patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 47.

Claims 54, 55 and 58 depend from claim 53. Therefore, Applicant submits that these claims are patentable over KAPUR and KLAVANS, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 53.

Claims 7 and 29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of MAURER. Applicant respectfully traverses this rejection.

Claim 7 depends from claim 1. MAUER does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 1. Therefore, Applicant submits that claim 7 is patentable over KAPUR, KLAVANS, and MAUER, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claim 29 depends from claim 23. MAUER does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 23. Therefore, Applicant submits that claim 29 is patentable over KAPUR, KLAVANS, and MAUER, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 23.

Claims 10-12, 32-34, 50, and 56 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of LINDBLAD. Applicant respectfully traverses this rejection.

Claims 10-12 depend from claim 1. LINDBLAD does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 1. Therefore, Applicant submits that claims 10-12 are patentable over KAPUR, KLAVANS,

and LINDBLAD, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 32-34 depend from claim 23. LINDBLAD does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 23. Therefore, Applicant submits that claims 32-34 are patentable over KAPUR, KLAVANS, and LINDBLAD, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 23.

Claim 50 depends from claim 47. LINDBLAD does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 47. Therefore, Applicant submits that claim 50 is patentable over KAPUR, KLAVANS, and LINDBLAD, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 47.

Claim 56 depends from claim 53. LINDBLAD does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 53. Therefore, Applicant submits that claim 56 is patentable over KAPUR, KLAVANS, and LINDBLAD, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 53.

Claims 18-19 and 40-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of CODEN. Applicant respectfully traverses this rejection.

Claims 18-19 depend from claim 1. CODEN does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 1. Therefore, Applicant submits that claims 18-19 are patentable over KAPUR, KLAVANS, and CODEN,

whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 40-41 depend from claim 23. CODEN does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 23. Therefore, Applicant submits that claims 32-34 are patentable over KAPUR, KLAVANS, and CODEN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 23.

Claims 20-22, 42-44, 51, and 57 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over KAPUR in view of KLAVANS, and further in view of BEEFERMAN. Applicant respectfully traverses this rejection.

Claims 20-22 depend from claim 1. BEEFERMAN does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 1. Therefore, Applicant submits that claims 10-12 are patentable over KAPUR, KLAVANS, and BEEFERMAN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 1.

Claims 42-44 depend from claim 23. BEEFERMAN does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 23. Therefore, Applicant submits that claims 42-44 are patentable over KAPUR, KLAVANS, and BEEFERMAN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 23.

Claim 51 depends from claim 47. BEEFERMAN does not overcome the deficiencies of KAPUR and KLAVANS set forth above with respect to claim 47. Therefore, Applicant submits that claim 51 is patentable over KAPUR, KLAVANS, and

BEEFERMAN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 47.

Claim 57 depends from claim 53. BEEFERMAN does not overcome the deficiencies of KAPUR and KLAVANS with respect to claim 53. Therefore, Applicant submits that claim 57 is patentable over KAPUR, KLAVANS, and BEEFERMAN, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 53.

In view of the foregoing remarks, Applicant respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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